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Organization:

Title:

Comments: Recreational Fee Comments

I appreciate that the Forest Service is asking for and considering public input before finalizing the fee and permit structure. First, I would like to let you know I am invested in the Central Cascade Wilderness. I have lived in Bend since 1983, raised my family here and we have hiked many of the trails involved in the CCWSP EA. I am a High Cascade Forest Volunteer, and a member of SWATS, sawyers with attitude to spare, which clears more than 10 trails for Deschutes and Sisters N.F. annually. I am a co-steward with my husband for a section of the Pacific Crest Trail and the Jefferson Lake Trail.

I believe applying a "special recreational permit fee" is a misuse of the TITLE VIII--FEDERAL LANDS RECREATION ENHANCEMENT ACT and removes protection to the public of those exempt from fees and removes the requirement that Forest Service provide services for fees.

h) Special Recreation Permit Fee.--The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use.

I would say walking in the wilderness is not a specialized recreation use. Even staying over night isn't.

When the Forest Service chooses to only offer permits by "group", it does not make an individual going on a day hike or overnight a "group". This is slick way to create a fee, without providing the American public with value. To me group is more like the Girl or Boy Scouts, Mazamas, Sierra Club, or Rhodes Scholars etc. Or group activity like a company having group bonding challenge/experience, cross county races on trails, or reenactors retracing the historic trails through the mountains. I think the legislators need to add a definition for "group" so this law may be applied as intended.

(1) PROHIBITION ON FEES FOR CERTAIN ACTIVITIES OR SERVICES.--The Secretary shall not charge any standard amenity recreation fee or expanded amenity recreation fee for Federal recreational lands and waters administered by the Bureau of Land Management, the Forest Service, or the Bureau of Reclamation under this Act for any of the following:

(B) For general access unless specifically authorized under this section.

(C) For dispersed areas with low or no investment unless specifically authorized under this section

(E) For camping at undeveloped sites that do not provide a minimum number of facilities and services as described in subsection (g)(2)(A).

(3) PROHIBITION ON FEES FOR CERTAIN PERSONS OR PLACES.--The Secretary shall not charge an

entrance fee or standard amenity recreation fee for the following:

(A) Any person under 16 years of age.

(B) Outings conducted for noncommercial educational purposes by schools or bonafide academic institutions.

A standard amenity fee would be more accurate application of a fee structure for the Sisters, Washington, and Jefferson Wildernesses.

The Wilderness Act of 1964 set aside land for the use and enjoyment of the American Public now and in the future. The Forest Service was tasked to provide access and stewardship of the wilderness. I appreciate this is a momentous task.

One problem is that the number and type of those invited to develop the Central Cascade Wilderness Strategy Project did not create a balanced solution for now/future or access/stewardship. There is a thumb placed on the scale of protect/monitor/restrict/study. 2 administrators, 12 scientist, 2 public affairs, 2 wilderness specialists and 1 Recreation Staff was on the Interdisciplinary team and team support. At my first N.F.S. volunteer training, the wilderness ranger I met expressed his desire that the Pacific Crest Trail would be relocated outside the Wilderness, not access fan. Having 1 devoted recreation staff on the support team representing the public's interest to access seems totally inequitable.

Another problem created by this choice of members is viewpoints that are focused on the negative micro effects of the public's use and enjoyment of the wilderness and a solution by restricting access. Micro when considering that a soil scientist is looking for dirt compaction and yes where there is a designated camp ie Green Lakes there is soil compaction as a result of the American people having access to backpack with a tent. Or next to lakes where the American people sat down to enjoy their lunch while taking in the beauty of the wilderness. Or where a individual wants to remember this wonderful scenic experience and share with friends or family by taking a picture of lakes, falls, mountains, someone with them or a selfie there may be soil compaction. Now ask the botanist to examine the wilderness, yes there is damage to the individual plants in those areas. Then multiply this by the hydrologist, fisheries people, wildlife biologist, archaeologist, etc. If you look at the full picture the effects of the public in trail widening, areas of visitation and the large number of visitors to Green Lakes is small to overall area of these wildernesses. Widening the 4.5 mile from 2 to 3 feet is 23,760 ft. out of the 437,000 acres or about .000125 % of limited entry system and less for the wilderness as a whole. Of course the area of a viewpoint or lunch stop is much smaller. I had heard that Green Lakes was terribly damaged by the huge amount of visitors that go there in a summer. I needed to see for myself. I also wanted to visit before the charges started. I was surprised that there wasn't as much as I expected from the reports. Yes, there were areas where the trail was wider. Yes, you could see some limited vegetation was missing at lunch spots and photo opportunities. And yes when we back tracked to find the best water fall on the trail the plants were growing back.(the trail has been rerouted away from this falls). But the experience of wilderness, the beauty, grand vistas, pretty flowers, sounds, fresh && invigorating air and exercise were all there to enjoy. We met people on the trail but that did not detract from the day. I don't think there is a necessity to limit access to provide for future use and enjoyment of the wilderness to happen.

I appreciate the Willamette Forest's goals which is reflected in the fewer number of trails they included in the limited entry and the higher number of visitors given access. Deschutes' goals on the other hand ignore the core tenants of the Wilderness Act of providing the American people with the benefit of wilderness for there use and enjoyment by placing constraints like solitude which is only one option along with "a primitive and un-confined type of recreation"; and naturalness instead of primitive conditions(without habitation or development).

36 CFR 293.2

(b) Wilderness will be made available for human use to the optimum extent consistent with the maintenance of primitive conditions.

Wilderness areas are a separate Management Area under each Forest Plan with the following goals:

Willamette (Management Area 1)

Goal: Provide a lasting system of quality wilderness, recognizing public use and the unique characteristics of wilderness.

Deschutes (Management Area 6)

Goal: To feature naturalness, opportunities for solitude, challenge, and inspiration, and within these constraints to provide for recreational, scenic, scientific, educational, conservation and historical uses.

## WILDERNESS SYSTEM ESTABLISHED STATEMENT OF POLICY

SEC. 2. (a) In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this purpose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by

Congress as "wilderness areas", and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness; and no Federal lands shall be designated as "wilderness areas" except as provided for in this Act or by a subsequent Act.

## DEFINITION OF WILDERNESS

(c) A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which

(1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable;

(2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation;

(3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and

(4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

I am not in favor applying a Special Recreation Permit Fee for backpacking or day hikes in low use areas. These low use areas are an important part of the wilderness spectrum but, this fee is will be a burden to lower/medium income families (not doctors, lawyers and professionals). For instance a family of 5 (above the age of 12 ) would cost \$81 for a three day backpack, \$181 for a week backpack, \$272 if they just take a hike once a week during the summer limited permit season. This will exclude many lower/medium income families from the wilderness or limit their access to it. Leaving these lower use trails available mitigates the social injustice set up by this permit system. Yet the most spectacular areas will still be out of bounds. It has been suggested that the limited entry permit effects only 13% of the area available in the National Forest, but it is 100% of the Wilderness in the Sisters, Washington, and Jefferson National Forest with the adaptive management plan in place. The physical, mental, emotional, and spiritual health benefits of travel in the wilderness should not be withheld to the American people.

I also am not in favor of applying a Special Recreation Permit Fee for remote low use trails because it is not financial sound practice to provide access like road improvements and enforcement of permit requirements over such a large area as well as maintain the trails in a level which the public should expect after paying \$181 for a week of backpacking. Free self-issued permits would be a better use of the limited resources of the Forest Service.

I am not in favor of applying a Special Recreation Permit Fee because I think it will be hard to enforce. When this proposal came out, a friend shared with me. How will they enforce it? When meeting a ranger asking for my permit, I could answer, "My name is Bob Smith, and no I didn't bring any Identification." So, how will they fine me? This never occurred to me and I won't do that, but others may. I figure I'll have to limit my times in the wilderness according to my budget and be unhappy.

I do think this Limit Entry Plan will damage the image of the National Forest Service. Instead of providing and promoting the value and spontaneous use of wilderness some will feel excluded or policed. I know I've come to the conclusion after following the CCWSP that expanding or adding more land to the wilderness will likely limit my access to the forest. I never before thought I wouldn't be in favor of wilderness expansion. It makes me sad.

I am disappointed, disheartened, and offended that the limited entry permit plan that gives me an exception for the time I'm working in the wood for the Forest Service, but I can't go use the wilderness except by applying for a limited number of slots way in advance that may be weather (inclement or hazardous) effected. And I only receive a total refund if there is a fire. These issues are also a problem for the public. In the past, I was pretty happy when my contribution was recognized by the National Forest Service and the PCTA with a Northwest Forest Pass and a T-shirt. I felt good helping open and improve the trails and access to the wilderness for all who would come. I feel this proposal will hurt the ability of the Forest Service to attract and retain volunteers. I'm less likely to volunteer for a organization that is charging for and limiting access to the wilderness.

In conclusion I am in favor of retaining the current permit and parking charges. Adding a donate page to the Deschutes and Willamette Forest Service website like the popular "Go Fund Me Sites", allowing the public to fund the wilderness. There are many who would monetarily support Wilderness. Having specific categories allows the environmentalists to choose monitoring of solitude, etc., hikers/riders could to choose trail maintenance. Other categories could be youth development, education, invasive weed removal, restoration, and new trail creation. This "Go fund me" approach has been very effective locally with the many miles of trails the mountain bike enthusiasts have funded and added to the forest. Also there would be no need of fund policing fee permits.

I will make some comments on the specifics of this proposal also:

If this proposal is approved I think the majority of funds raised should be spent on trail work and restoration/mitigation/resource protection(log bridges or boulder across streams, armoring tread in areas with erosion issues), 80%.

Since there is an allowed but hard to follow (by elevation) policy for camp fire use, which causes work for the wilderness rangers and volunteers (policing and removal of trash and wrong placement, unintended fires), I am in favor of requiring a campfire permit and fee. Maybe less people will have campfires.

Since the F.S. allows dogs in the wilderness and there are negative effects to the wildlife, water quality, wilderness experience - some are threatening, some overly friendly and (those cute little dog poop bags that are left for the return trip and sometimes forgotten or misplaced), I am in favor of requiring a permit and charging a fee for each dog.

I am in favor of placing a cap on the number of nights charged on backpacking permits like other wildernesses (The Desolation Wilderness charges for the first two nights). This would reduce the public having to curtail/restrict of their plans due to cost.

Since many of the Forest Service concerns are based on the number of person trips and a sustainable quota has been established, those permits that are not issued should be rolled to future dates. Those available through the library may be rolled to future dates or possibly to general availability or a portion there of if the Forest Service finds there is an abundance of unclaimed spots.

I would support families and youth by raising the fee exemption for children to 16 years old.

Thank you for your consideration.

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